

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Nikko D'Ambrosio,

Plaintiff,

v.

Abbigail Rajala, et al.,

Defendant.

No. 1:24-cv-678

Judge Sunil R. Harjani

**Motion for Extension of Time to
Answer or Otherwise Plead to Second Amended Complaint**

Defendants Abbigail Rajala, Carol Rajala, and Rodney Rajala respectfully request a 1-day extension of time to answer or otherwise plead to the Second Amended Complaint. *See* [53].

A responsive pleading to the Second Amended Complaint is due today, Friday, December 6, 2024. Counsel for Defendants had previously prepared a responsive pleading but needed to review certain issues raised in it with Defendants before filing. Undersigned counsel had overtaken these efforts, largely due to matters related to lead counsel's duties as lead counsel in a capital prosecution, *United States v. Resendez*, No. 1:22-cr-395-1 (Kness, J.) (N.D. Ill.).

Despite Counsel's best efforts to complete the Defendant's brief in a timely manner, a unexpected personal health emergency as well as an issue in formatting Defendant Abbigail Rajala's brief delayed completion of counsel's motion. As a result, counsel requests a one-day extension to complete Defendants' submissions.

Counsel has been unable to contact opposing counsel due to the nature of the emergency and will do so promptly to determine whether they oppose this request.

Respectfully Submitted,

/s/ Andrew D. Finke

Attorney for Defendants

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